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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TINISHA PRICE

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

)
) Case No. 2:17-cv-00755-JCM-VCF
)

) **JOINT STIPULATION FOR EXTENSION OF**
) **TIME TO FILE DEFENDANT'S NOTICE OF**
) **VOLUNTARY REMAND OF THE CASE OR**
) **CROSS-MOTION TO AFFIRM**

) **(Third Request)**
)

1 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that
2 the time for responding to Plaintiff's Motion for Summary Judgment be extended for one week from
3 September 15, 2017 to **September 22, 2017**. This is Defendant's third request for extension. Good
4 cause exists to grant Defendant's request for extension. Counsel continues to have debilitating
5 migraines and daily headaches and is on intermittent medical leave. As a result of unanticipated
6 medical leave, Counsel respectfully requests additional time in order to address the issues raised in
7 Plaintiff's Motion. Defendant makes this request in good faith with no intention to unduly delay the
8 proceedings. Plaintiff has no objection to the requested relief. The parties further stipulate that the
9 Court's Scheduling Order shall be modified accordingly.
10

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12 Respectfully submitted,

13 Date: September 14, 2017

14 By: /s/ Cyrus Safa
15 CYRUS SAFA
16 *by email authorization on 9/14/17
17 Attorney for Plaintiff

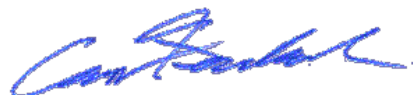
18 Date: September 14, 2017

19 STEVEN W. MYHRE
20 Acting United States Attorney

21 By: /s/ Tina L. Naicker
22 TINA L. NAICKER
23 Special Assistant United States Attorney

24 **IT IS SO ORDERED.**

25 DATE: 9-15-2017

26 
THE HONORABLE CAM FERENBACH
United States Magistrate Judge

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION FOR EXTENSION OF TIME TO FILE DEFENDANT'S NOTICE OF**
4 **VOLUNTARY REMAND OF THE CASE OR CROSS-MOTION TO AFFIRM**

5 on the date and via the method of service identified below:

6 **CM/ECF:**

7
8 Cyrus Safa
9 Attorney at Law: 13241
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17 Gerald M. Welt
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23
24 Respectfully submitted this 14th day of September 2017,

25 /s/ Tina L. Naicker
26 TINA L. NAICKER
Special Assistant United States Attorney